

EXHIBIT H

Exhibit 18

1 U. ROWE
 2 knowledge, already provided your lawyers
 3 with all documents and information that you
 4 have in your possession that relates to
 5 this case?
 6 A. Yes.
 7 MR. GAGE: Sara, could you mark
 8 tab 6 as Exhibit 3.
 9 (Defendant's Exhibit 3 marked
 10 for identification.)
 11 MS. TOMEZSKO: It should be
 12 available now on the drive.
 13 Q. Let me know when you have a PDF
 14 that is labeled tab 6, Ms. Rowe, and the
 15 Bates number on this, for the record, is
 16 P001586-1587.
 17 A. Yeah, I have it.
 18 Q. What is this?
 19 A. I believe these are some notes
 20 that I took during the conversation with
 21 Melissa, Melissa Lawrence.
 22 Q. And these notes were recently
 23 provided to us in discovery. When did you
 24 give these to your lawyer?
 25 A. My lawyers had them for a while

1 U. ROWE
 2 knowledge, does this reflect notes that you
 3 took close in time to that conversation
 4 taking place?
 5 A. Correct.
 6 Q. Did you record everything that
 7 was said in the conversation?
 8 A. It is not a transcription of
 9 the conversation, it's the highlights of
 10 like what stuck with me, the summary of the
 11 conversation.
 12 Q. So this reflects what stuck
 13 with you from the conversation?
 14 A. Correct.
 15 Q. But not necessarily everything
 16 that was said?
 17 A. It was meant to represent a
 18 summary of the conversation, yes.
 19 Q. But not necessarily everything
 20 that was said?
 21 A. It doesn't capture every single
 22 sentence as it was said, but it was also
 23 not meant to leave out, you know, major
 24 topics.
 25 Q. And Melissa -- what is

1 U. ROWE
 2 happened.
 3 Q. And when was the conversation?
 4 A. So sometime in November of
 5 2017.
 6 Q. At the top of the document it
 7 says 20 November 2017. Do you see that?
 8 A. I do.
 9 Q. Did you write that date to
 10 represent the date you wrote the notes?
 11 A. I don't remember that. I don't
 12 remember if it was the date of the
 13 conversation or the date of the notes.
 14 Q. And the first line says
 15 "Summary of the items we discussed today."
 16 Who is the "we"?
 17 A. Melissa and I.
 18 Q. And how did this conversation
 19 take place, was this face to face, was this
 20 over the phone?
 21 A. I believe this was
 22 videoconference, video conversation.
 23 Q. Who initiated it?
 24 A. I did.
 25 Q. And to the best of your

1 U. ROWE
 2 presence that you would deem to be sexist?
 3 A. Again, it's not -- it's not the
 4 individual words, you know, but it's how
 5 people behaved and how people reacted to me
 6 that led me to believe.
 7 MR. GAGE: Could you reread my
 8 question, please.
 9 (The record was read.)
 10 Q. Can you answer that question?
 11 A. So I can't point to one
 12 conversation.
 13 Q. Can you point to any
 14 conversation in which someone said
 15 something that you would consider to be
 16 sexist?
 17 A. So, again, it's not just one
 18 conversation, but, you know, when I was
 19 working for Tariq, the fact that, you know,
 20 he would include his other direct reports,
 21 he would have one-on-ones with them, he
 22 wouldn't have one-on-ones with me, the fact
 23 that I wasn't involved in his -- in his --
 24 in his staff meetings, you know, all of
 25 those things, like the way I was treated

1 U. ROWE
2 differently because of people's actions,
3 are part of what led me to believe that I
4 was discriminated against.
5 So if you are asking me has
6 anyone said because of your sex we're doing
7 X and Y, no. But have their actions led me
8 to believe that, yes.
9 Q. Let's try this again.
10 I'm not asking about people's
11 actions, Ms. Rowe. I'm asking about
12 people's words. Do you understand the
13 distinction I'm making?
14 A. I do.
15 Q. So let's focus on people's
16 words.
17 Has anyone, in your time at
18 Google, anyone at Google, said anything to
19 you or in your presence that you would
20 consider to be sexist?
21 A. Again, I can't remember
22 individual instances or words, no, but it
23 is the collective experience.
24 Q. So are you saying that you
25 cannot, sitting here today, point to

1 U. ROWE
2 time at Google.
3 Q. Anything else?
4 A. Those are the high-level ones
5 that I -- those are the high-level ones,
6 yes.
7 Q. Are there any others?
8 A. Those are the ones I can
9 remember right now.
10 Q. So you can't right now identify
11 any other ways in which you believe you
12 have been discriminated against at Google?
13 A. Not right now.
14 Q. Is there anything that you
15 think you might look at to refresh your
16 recollection?
17 A. No, not right now.
18 Q. So let's take the second one
19 you mentioned. You said that you believe
20 on a day-to-day basis you have been
21 discriminated against. Tell me all of the
22 things that have happened to you on a
23 day-to-day basis that you believe indicate
24 that Google has been discriminating against
25 you on the basis of your sex.

1 U. ROWE
2 MS. GREENE: Objection, asked
3 and answered.
4 A. Yes.
5 Q. So now let's talk about deeds.
6 We talked about words, now let's talk about
7 deeds. Please describe for me all of the
8 deeds or actions that people at Google have
9 taken that lead you to believe that you
10 have been discriminated against on the
11 basis of your sex.
12 A. So I was -- so Google
13 discriminated against me on hiring, you
14 know, by bringing me in at a lower level
15 and paying compensation at a lower level
16 than my male peers. Google discriminated
17 against me by the way I was treated on a
18 day-to-day basis. Google discriminated
19 against me by, you know, denying me a
20 promotion for which I was the most
21 qualified candidate. And I was also
22 discriminated against by Google by the
23 continued pay and compensation during my --
24 by paying me less compensation, you know,
25 equity refreshes and otherwise during my

1 U. ROWE
2 A. So, you know, I think, first of
3 all, about my leveling and compensation,
4 you know, that was an ongoing --
5 Q. I said I wouldn't interrupt
6 you. I'm going to apologize and interrupt
7 you here.
8 So in your answer a minute ago
9 you identified four things. You identified
10 your hiring at a lower level and at lower
11 compensation, the second thing you
12 identified was that you have been
13 discriminated against on a day-to-day basis
14 you said, the third thing you mentioned was
15 denied promotion, then the fourth thing you
16 mentioned was the denial of equity
17 refreshes and compensation on an ongoing
18 basis, right?
19 A. Yes.
20 Q. That's four things. I want to
21 first start with the second of those
22 things.
23 A. And also, you know, other
24 opportunities as well, I was denied other
25 opportunities.

U. ROWE

Q. Other opportunities, and are those other job opportunities that you sought and did not get?

A. There was at least one of those.

Q. And when was that?

A. So the denied promotion was the VP of financial services, and later I raised my hand for a VP of sales role in financial services, the head of financial services and sales, that was the role.

Q. So the first one is the financial services vertical head job, correct?

A. Correct, VP of -- yes.

Q. And that was the job that you claim was given to Stuart Breslow, right?

A. Correct.

Q. Just to make sure we're talking about the same thing, okay. Tell me again, what was the second opportunity that you were denied?

A. I raised my hand for the VP of financial services role and sales.

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item only, I want you to tell me everything that anyone did to you at Google that you believe reflected discrimination against you on the basis of your sex.

A. When I worked for Tariq, he would, you know, regularly have one-on-ones with other male peers but not with me. I was frequently left out of team meetings, left out of customer discussions. I was left out of off-sites. Those are some of the ways I remember.

Q. What other ways?

A. Those are the ones I remember right now.

Q. Were there others?

A. Well, you know, obviously being left out of these meetings and some of these in-sites also meant that I was no longer, you know, part of some of the strategic discussions, while my male peers were. So, you know, I think that is a second order of facts.

Q. Well, we will come back to each of those. But I want to know, were there

U. ROWE

Q. And when was that?

A. I don't remember the exact timing, but I think it was earlier this year.

Q. So you think sometime in 2020, early 2020?

A. Yes.

Q. Before or after the pandemic shut down the country, can you place it that way?

A. Before.

Q. Before, okay, so sometime before the middle of March, is that fair to say?

A. Yes.

Q. And was that a job that was posted internally at Google?

A. I don't know if there was a job posting. I didn't see a posting.

Q. We will come back to that.

But I want to go back to the second item that you mentioned, and that is you said that you were discriminated against on a day-to-day basis. So on that

U. ROWE

Stuart was included and I wasn't.

Q. How many off-sites took place while you worked for Tariq that you were not invited to?

A. I don't know.

Q. Do you know how many off-sites Tariq had during the time you worked for him?

A. I don't know.

Q. Do you know if -- do you know if Tariq had any off-sites during the time you worked for him that you were not invited to?

A. I don't know.

Q. You indicated that you believed you were left out of team meetings. What team meetings were you left out of?

A. So Tariq would have regular team meetings that he would use his team e-mail to send invitations to, so I was left out of those, and other meetings where he met with his team members but I wasn't there.

Q. How many times did that happen,

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1 U. ROWE
 2 that is, that he held a team meeting that
 3 you were not invited to?
 4 A. I don't know.
 5 Q. Was it more than once?
 6 A. Yes.
 7 Q. Was it more than twice?
 8 A. Yes.
 9 Q. Was it more than three times?
 10 A. Yes.
 11 Q. How many times was it?
 12 A. Look, obviously I don't know
 13 every meeting that I wasn't invited to.
 14 But I know that I have regularly heard
 15 about these meetings that people were at
 16 where I wasn't at. So I have heard about
 17 it probably at least four or five times, I
 18 don't know the exact number of the meetings
 19 that actually did happen.
 20 Q. Who is the -- tell me by name
 21 the team members who were invited to these
 22 meetings that you say you were not invited
 23 to.
 24 A. Well, I think some of them were
 25 his direct reports, you know, his staff

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1 U. ROWE
 2 Q. Give me names. Who?
 3 A. Look, I don't actually recall
 4 the individuals that told me, but, you
 5 know, I heard it, I heard it from people
 6 that these meetings were happening.
 7 Q. So you can't give me a single
 8 name of someone that you heard about these
 9 meetings from?
 10 MS. GREENE: Objection.
 11 A. I just said Stuart Breslow was
 12 one of them, and also, you know, some of
 13 Tariq's other direct reports.
 14 Q. Other than Stuart, can you give
 15 me the name of a single other individual
 16 who shared information with you that led
 17 you to believe that he or she had been
 18 invited to a meeting with Tariq that you
 19 were not invited to?
 20 A. Look, another person I heard it
 21 from was Leonard Law.
 22 Q. When was that?
 23 A. I don't remember the exact.
 24 Q. What was the meeting that
 25 Leonard Law told you about that you

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 2 meetings, where I wasn't included. Now, I
 3 don't know who was included, because I
 4 wasn't there. And the other meetings were
 5 either, you know, talking about financial
 6 services or a specific client or other
 7 topics. Again, I don't know how many of
 8 these I wasn't invited to, but I heard
 9 from -- sometimes I would hear from Stuart
 10 himself that the meetings had happened,
 11 sometimes I would hear it from other
 12 participants.
 13 Q. Who? What other participants?
 14 A. Again, because I wasn't in
 15 these meetings, I don't know exactly who
 16 were in these meetings, but I know that --
 17 Q. You just said you heard it from
 18 other participants. I want to know who you
 19 heard it from.
 20 A. Yeah, I'm not done. You know,
 21 I heard it sometimes from Stuart Breslow.
 22 Sometimes I heard it from, you know, the
 23 account teams, if they were talking about a
 24 client. Sometimes, you know, I would hear
 25 it from, you know, other peers.

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 2 believed you should have been invited to?
 3 A. I don't know what the meeting
 4 was about, but it was about financial
 5 services.
 6 Q. Was that at a point at which
 7 you were still in Tariq's organization when
 8 Leonard Law shared that with you?
 9 A. I believe so, yes.
 10 Q. Did you believe you should have
 11 been in every meeting that Tariq held with
 12 anyone who worked on his team?
 13 A. No.
 14 Q. Did you believe that you should
 15 have been invited to every meeting with
 16 Tariq that had anything to do with
 17 financial services?
 18 A. No. But I do believe that I
 19 should have been in every staff meeting
 20 that he had.
 21 Q. When you first came to believe
 22 you were not on the e-mail list for his
 23 staff meetings, what did you do? Did you
 24 tell anyone?
 25 A. Yes.

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Q. Who did you tell?

A. So, first, I asked my admin to check with Tariq's admin to make sure it was okay, then I asked -- I believe I asked Tariq's admin directly, and, finally, I asked Tariq.

Q. And what did you learn?

A. The responses changed over time, but it was, you know, first, I think -- I think some of the answers were they were working on the e-mail lists, so, you know, it was in flight. Other times it was an oversight. Other times it was, you know, they forgot. You know, so the answers changed.

Q. Do you have any reason to believe that any of the responses you got were false?

A. Look, I don't have any reason to believe the responses were false, but I knew that my male peers were in these meetings and I wasn't, so I was being treated differently.

Q. What male peers?

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A. No. I mean, we didn't have a discussion on whether this would be in OCTO or elsewhere.

Q. Was there not a function at the time you were hired at Google that was responsible for strategy and product development in Cloud for financial services, did that function not exist?

A. It did not exist.

Q. So what were you hired to do?

A. So I was hired as an individual contributor in OCTO to do, you know, the three -- the role that you and I have discussed that has these elements of, you know, advisory for product and eng, it has client engagements, thought leadership. But I certainly was not the VP of financial services.

Q. How is that different than the function you just described when you told me what you understood the verticalization to mean?

A. So the verticalization has multiple components. You know, I think it

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process, was it important to you to clearly understand the terms and conditions of employment that Google was offering to you?

A. Yes.

Q. And was it important to you to have all of the details of the job offer you were getting put in writing?

A. Yes, but there were -- there were elements that were not in writing.

Q. Can you tell me all of the elements that were not in writing?

A. So when we had the initial conversations during hiring, you know, I was -- there were a couple of things. One of them was the fact that, you know, that when Google verticalized, that I would be the obvious person to be the head of that vertical as the VP of financial services. And there was also another element that the equity refreshes that I would get over time, you know, would put me in a place that is on par with my peers and at a level that I was making more than J.P. Morgan.

Q. You just mentioned two things,

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has, one, the strategy for the vertical. It has, you know, also building products elements of it, and also, you know, a connection to sales. You know, it's a -- it's a -- it's a -- it's a -- it's a role with bigger decision-making capabilities.

Q. So did you understand verticalization to be a reference to a future role within Google Cloud, a job?

A. So yes, yeah, that would be a different role, you know, and that function, this does get created, that's what I had been led to understand.

Q. Did either Mr. Grannis, Mr. Stevens, or Ms. Burdis, anyone, did anyone indicate to you that there was going to be a vice president job in the future at the head of the financial services vertical?

A. They didn't use those exact words, but the words that they used were, you know, when and if Google verticalizes, who but you would be the obvious person for that role. Again, I'm not quoting, these

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videoconference?

A. Yes.

Q. And you later learned that it wasn't a different role, it was just a change in reporting relationships, correct?

A. Incorrect.

Q. So is it your testimony that when you moved into Tariq's organization your role changed?

A. So it is true that Tariq said that the role is not going to change. The way he described the role was a much more junior role. And this exchange was the last time that Tariq and I talked about the role, so I continued to do certain aspects of what I did in OCTO, but because I wasn't included in any of -- in many of the financial services discussions and other things, so I ended up, you know, my scope ended up being reduced from what I used to do over at OCTO.

Q. What did you do when you were in OCTO that you were no longer doing when you were working in Tariq's organization?

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account teams, sometimes directly from -- through Will and Brian.

Q. And then when you were in Tariq's team, who was initiating the client engagement?

A. So still I wasn't getting much from Tariq, so whatever I got was from the sales team. But, you know, Stuart was the, you know, placed in a -- in a role and he, you know, most of the time he was the one that Tariq pinged for some of these engagements.

Q. And when you talk about Stuart being placed in the role, you are talking about the head of financial services role?

A. Even before then, Stuart was being included in discussions that I wasn't in.

Q. And is that anything other than what you previously testified about? Are you talking about something different than what I asked you about earlier?

A. I don't know what earlier conversation you are referring to.

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A. So when I was in Tariq's organization, I was regularly left out of discussions about the financial services space, you know, what was going on there. I was left out of, you know, customer meetings. I was left out of, you know, the strategy setting for that vertical. So that was what I was doing on a day-to-day basis. Now, the description of the global client role itself was even more restrictive.

Q. But my question to you was what were you doing when you worked in OCTO that you were no longer doing when you were in Tariq's organization?

A. I thought I answered that. But basically my focus on product and eng was limited or reduced. My client engagements, you know, were reduced. And my thought leadership was also not as big as before.

Q. Now, on the client engagement, when you were working in OCTO, who was initiating the client engagement?

A. Most of the time from the sales

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MS. GREENE: Objection.

A. Well, I knew what kind of individuals were, and based on that I made the statement that I was better qualified.

Q. Now, you have since, in the course of discovery, come to know who some of the other candidates were, correct?

A. I saw some of the names, yes.

Q. Were you better qualified than all of them?

A. Look, I don't know, and I can't speak to all of their qualifications, but I know who the role ultimately went to, and I -- and I kind of know my qualifications with respect to that individual, so I can speak to that.

Q. Do you know who [REDACTED] is?

A. I have heard the name.

Q. Do you know anything about her qualifications?

A. I don't know much. I know that at some point she worked in [REDACTED] and she is a [REDACTED] -- I don't know if she is still

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U. ROWE

A. After Stuart got the job, is that what you are asking, did I discuss with Tariq?

Q. Yes.

A. No.

Q. Did you ever have any discussions with Mr. Shaukat about what your role would be in his organization going forward?

A. So in, I think it was in February, I was told that my role was being changed. I was given, you know, three options.

Q. What were those three options?

A. I was given an option to work on a focused small project, working for Stuart Breslow. I was given the option to go back to OCTO without a financial services focus. And third option wasn't really even real, it was that I could stay and he could park me under Stuart until I found a different role. And I considered all of these three as demotions.

Q. You had all of these, I'm

U. ROWE

Q. You indicated that -- you testified earlier today that you believe you were denied equity refreshes because of your sex. Tell me everything that leads you to believe that the equity refreshes you got, the amount of them, or when you didn't get equity refreshes, what leads you to believe that that was because of your sex.

A. Well, I was down-leveled on hire, and that translated into lower compensation as well as lower equity refreshes compared to my male peers.

Q. Is there anything else that leads you to believe that your equity awards were based on your sex?

A. Well, yeah, I can't think of anything else, it's basically the way that I was leveled, and that carried on, you know, that continued to haunt me, so to speak, through my time at Google.

Q. Now, you used a term a minute ago that I don't think either of us have used in today's deposition until now, and

U. ROWE

sorry?

A. I considered all of those options as demotions.

Q. As demotions, okay. Why did you consider them demotions?

A. Well, one of them wasn't even a role, it was go find another job, like I would have no job, the other one was a much more junior role, you know, working as a, you know, in a much smaller focus project, I think the AML project at the time, much more junior role, or I would go back to OCTO, but Google would remove all of my financial services focus.

Q. And you chose to go back to OCTO, correct?

A. Correct.

Q. Now, when you first moved over into Tariq Shaukat's organization from OCTO, Ben and Evren also moved from OCTO into Tariq's organization, correct?

A. So they were also told that they were moving. I believe Evren never actually moved.

U. ROWE

Q. What happened next?

A. He said that he would talk to Kristen and come back to me.

Q. And did he?

A. He did.

Q. And what happened next?

A. He said that based on the conversations with Kristen, that they weren't going to go ahead with me.

Q. Did he tell you anything more, did he give you any more details?

A. I don't remember a lot of the details, but I was surprised when he said based on your interview with Kristen, I did not have an interview with Kristen, this was like a casual one-on-one get-together, I found out about the opportunity during that meeting, and that, you know, he told me that based on that conversation that I was being discounted, I was surprised.

Q. And was that the end of it?

A. Yes.

Q. Did you ever follow up with Kristen?

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happened.

Q. So, again, other than the sequence of timing, is there anything else that leads you to believe that anything that happened to you at Google was because of your complaints of discrimination?

MS. GREENE: Objection.

A. I think it's not just the sequence of events, but actually what happened as well.

Q. And the "what" is you say you were demoted, you say you were isolated, and you were denied this other job that was given to Yolande Piazza?

A. Correct.

Q. Those are the things that happened?

A. Correct.

Q. And my question to you is other than the sequence of timing between your complaints of discrimination and the timing of those things I just mentioned, other than the timing, is there anything else that leads you to believe that those events

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events, right?

A. That's another one of those.

Q. Not being invited to off-sites, right?

A. That's also one of those.

Q. Okay, what else was there? What else constitutes the isolations?

A. I was isolated, one, because I was told that I couldn't focus on financial services anymore, so Google removed that responsibility from me. And that meant that I was isolated from any discussions around, you know, go to market, around customer interactions, around, you know, press and media appearances, and I was isolated on, you know, what events I could go talk to.

So there was a lot of these things that I was isolated by whereas, you know, my male peers, Stuart Breslow and others, weren't.

Q. When were you told that you were no longer to focus on financial services?

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were because of your complaints of discrimination?

MS. GREENE: Objection.

A. Again, it's not just the timing, you know, I was isolated.

Q. Then what else is it?

A. Because like I was isolated when my male peers were not isolated. When they were given opportunities, I wasn't given opportunities. So it is not just, you know, the sequence of what happened, but like what I experienced during that time.

Q. So what you describe as isolating, being isolated, what leads, other than the sequence of timing, other than those events occurring which you already testified about today -- withdrawn. Let me ask you more specifically.

When you say being isolated, you are talking about your testimony about not being invited to meetings, correct?

A. That's one of the things.

Q. Not being invited to client

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the three options that were presented to me.

Q. You had three options, and you chose, no one else chose for you, correct?

A. Of the options that were given to me, yes, going back to OCTO was what I chose.

Q. And Google had decided that when you were in OCTO, you were going to be focused on hybrid cloud, correct?

A. Yes.

Q. Do you have any reason to believe that that decision to have you focus on hybrid cloud was made because you had raised complaints of discrimination?

MS. GREENE: Objection.

A. So I don't know what went into that discussion, but what I have experienced was Google removed all my financial services related responsibilities, Google isolated me internally and externally, and I know that I was also denied further opportunities.

Q. I'm talking right now about

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comparable.

Q. How are they different?

A. I don't know what he does on a day-to-day basis, so I don't know, you know, what he does that might be different, but what I do know is that, you know, he does provide, you know, product and engineering guidance. He does provide thought leadership. He works across the organization. And he does have -- he does have, you know, client facing, and understanding his clients and building product type responsibilities.

Q. Does he write code as part of his job?

A. I don't know.

Q. Do you?

A. I don't, not production code.

Q. Have you ever, since you have been at Google?

A. So I have written code, but I have not contributed code to Google's products, if that's what you are asking.

Q. Do you know anyone else who is

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the role.

Q. Did she tell you who specifically to reach out to by name?

A. She said Stuart Vardaman but she may have mentioned another person. I don't remember the number.

Q. Did you say she said Stuart Vardaman?

A. That is my recollection.

Q. Did Miss Kliphouse tell you whether this job had been posted yet, advertised?

A. I don't remember that. I don't think so.

Q. Did Miss Kliphouse say anything to you about whether she had looked at or considered candidates as of that point?

A. I don't remember that. For your earlier question I think I said she didn't tell me it was posted, I don't know if it was posted internally in Google. She indicated that it was an active job search.

Q. As of the point at which you had coffee with her she told you that it was at

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Q. What did she tell you about the role she was planning to hire for?

A. She said that she was looking for a VP of sales for financial services and she also said that she is looking for people that are not from -- she was looking for people that don't have the traditional sales background. Those were not necessarily a good fit for the first time role either so she was looking more broadly.

Q. Did she use those words and what I mean by that is not looking for someone in the traditional sales background?

A. I don't remember her exact words, but she was definitely saying they are broadening to include nonsales background people, but I don't remember if those were her exact words.

Q. What if anything else do you remember about what Miss Kliphouse told you concerning this position and what she was looking for?

A. I told her I was interested in the role and she asked me to reach out to HR about

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that you would not be considered further for the role.

He sent you the job posting; correct?

A. He did.

Q. And do you have that available to you now? I think it should be shared with you I think it is previously marked as Plaintiff's Exhibit 115.

A. In the shared drive, yes.

Q. So you have it in front of you?

A. Yes.

Q. You received this after your conversation with Miss Kliphouse, correct?

A. Correct.

Q. Can you read to me the two lines at the bottom of the first page starting with the word "drawing"?

A. "Drawing upon previous demonstrable success leading sizeable technology sales teams that served he financial services industry."

Q. Did you have previous demonstrable success leading sizable technology sales teams

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2 that served the financial services industry?

3 A. I had sales experience. I didn't
4 directly lead sales teams, but based on how
5 Kirsten was describing the role, I thought it
6 was appropriate for me to raise my hand.

7 Q. I didn't ask you whether it was
8 appropriate for you to raise your hand. I just
9 asked you in fact if you had "previous
10 demonstrable success leading sizable technology
11 sales teams that served the financial services
12 industry." Did you?

13 A. No.

14 MS. GREENE: Objection, asked and
15 answered.

16 A. No, but I had relative experience
17 that would be useful.

18 Q. Did you have what you just read?

19 A. No.

20 Q. Were you discouraged when you read
21 that?

22 A. No.

23 Q. Did you -- I want to flip over to
24 the second page of this document in the middle
25 below the words "The financial services leader

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2 role.

3 Q. Have you ever met Miss Piazza?

4 A. We have been in meetings together,
5 yes.

6 Q. Do you have an opinion as to her
7 qualifications for this sales role based upon
8 your interactions with her?

9 A. Look, I can't speak to her
10 qualifications. I don't know enough about her.

11 Q. When she joined Google did you set
12 up a meet and greet with her?

13 A. I didn't, but she and I have been
14 in quite a few meetings together.

15 Q. Is there a reason why you didn't
16 set up a meet and greet with her when she
17 joined?

18 A. Look, I think -- I don't think
19 there is a specific reason.

20 Q. Was it your practice to set up
21 meet and greets with new leaders who had joined
22 Google from outside the company?

23 A. Sometimes, especially like if I
24 don't have reason to work with them on a
25 day-to-day basis. Others I work together all

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2 use a phrase I want to know what she means
3 by it. It's a different question, Cara

4 A. I'm just saying I don't know a
5 hundred percent. She may.

6 Q. But you're speculating about that,
7 correct?

8 A. Correct.

9 Q. Do you know who was hired for that
10 position?

11 A. I think at the end it went to
12 Yolanda Piazza.

13 Q. Do you know anything about her
14 qualifications for the job?

15 A. I don't know too much about her.
16 I know she came from Citibank and she had been
17 there for a long time and I don't know much
18 beyond that.

19 Q. Do you have an opinion as to
20 whether you're better qualified, equally
21 qualified or lesser qualify than Miss Piazza
22 for the role?

23 A. I don't know all of her
24 qualifications, I can't speak to that. I can
25 speak to the fact that I was qualified for the

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2 me on the VP of sales role. So he told me that
3 I would not be considered for the role.

4 Q. What did you say in response?

5 A. I asked some questions.

6 Q. What questions did you ask?

7 A. I asked him why.

8 Q. What did he say?

9 A. He said that they were looking for
10 someone that has a more commercial background.

11 Q. What else did you ask?

12 A. I asked him like what made them
13 think that I wasn't qualified for the role.

14 Q. What did he say?

15 A. He said that it was based on a
16 two-hour meeting that I had with Kirsten.
17 Two-hour interview actually he said.

18 Q. What else did you ask?

19 A. I think I added some more prodding
20 questions. I don't remember all the questions.
21 I said to him that I wasn't aware that the
22 meeting that I had with Kirsten was an
23 interview. I said to him that it was like a
24 meet and greet and that it was actually in this
25 meeting that I found out about this role. I

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was surprised. I expressed surprise.

He also mentioned there is a VP of solutions role that might be opening up that I might be a candidate for.

Q. How did you react to that?

A. I asked him what the role was and he said like we don't really know yet. It's a head of industry solutions that is coming up, but he will have more details then. But he did say that they -- he mentioned I think -- I can't remember her name. He mentioned I think Carrie the retail person that she would also be considered for the head of solutions for the retail position.

Q. Is that Carrie Farb?

A. Yes, I think that is the name.

Q. Did you ever express interest in this other role that he said might become available?

A. Well, I never heard about it subsequently until someone was announced.

Q. Did you tell Mr. Vardaman in that conversation that you were or might be interested in the position?

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do you have any reason to believe that the e-mail that you sent to your lawyers contains any additional details about the conversation with Mr. Vardaman that you've not already shared?

A. I don't believe so.

Q. I think you testified that Mr. Vardaman told you that they were looking for someone with a more commercial background for the position that Miss Kliphouse was filling.

What did you understand that phrase to mean, a more commercial background?

A. That they were looking for someone with a direct sales experience.

Q. Was that statement that Mr. Vardaman made to you consistent with the description of the job that he sent to you?

A. Yes, but it wasn't how Kirsten described the role.

Q. Well, how did Kirsten describe the role in a manner inconsistent with that?

A. Because she said they are looking beyond the pure sales experience, the

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